



All Aboard – an assessment of the current accessibility of public transport in Northern Ireland

March 2013

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About Imtac

Imtac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Regional Development.

About this paper

Bus and rail services in Northern Ireland have undergone significant changes over the past decade. The purpose of this paper is to examine and comment on how these changes have improved accessibility for disabled people and older people to public transport. The report also makes a number of recommendations designed to build on the progress made to date.

Background to change

There is now an acceptance that transport (as well as other goods, facilities and services) should be accessible and inclusive. It is important to understand the background to this change in attitude and provision. Much of the changes in our society has been driven by disabled people campaigning for equal rights in all areas of everyday life including transport. Alongside the rights movement significant work was undertaken to better understand passenger requirements leading to the development of accessibility guidelines and specifications for a range of transport services¹.

¹ See for example work undertaken by DPTAC in the 1980's and 1990's around specifications for buses.

The passage of legislation in form of the Disability Discrimination Act (DDA) in 1995 was a major step forward in making transport services more accessible in the United Kingdom. Whilst transport services themselves were originally exempt from Part 3 of the Act (Access to goods, facilities and services), Part 5 of the Act made provision for minimum accessibility requirements for buses, coaches and trains. Transport providers were also required to improve accessibility to stations and services such as information under other provisions of the DDA.

Transport policy has also adapted to changes in society and legislation. Throughout the 1980's and 1990's there was an increasing recognition in UK transport policy documents (at both national and regional level) of the need to make public transport more accessible and inclusive. However progress implementing change was painfully slow. In Northern Ireland a lack of investment in services meant that the end of the millennium was identified with a largely outdated network of ageing buses, trains and infrastructure.

The development of the Regional Transportation Strategy (2002) marked a major step forward in policy terms. The RTS contained an important commitment from Government in Northern Ireland to build in accessibility for disabled people as a condition of public money being spent on public transport. The Strategy included a proposal to develop an Accessible Transport Strategy to help to implement this commitment. Finally the RTS contained ambitious targets for making bus, coach and train services accessible by 2012 – much earlier than target end dates required by the DDA.

Progress in Northern Ireland

Since the start of the new millennium significant change has taken place in Northern Ireland with development and publication of the RTS. The provisions of the Disability Discrimination Act have been progressively introduced over the period setting minimum standards for buses and coaches² and trains.³ During the same period provisions of the Act that

² Public Service Vehicle Accessibility Regulations NI (2003)

require service providers to make physical alterations to their premises came into force.⁴ Finally legislation was introduced to remove/clarify some of the exemptions around using transport services originally applicable under the DDA.⁵

Coupled with changes in legislation Government has invested significant amounts in public transport services. Between 2004 and 2012 Government has invested over £150 million in bus replacement. This has allowed the purchase of over 1000 new buses and coaches all meeting minimum accessibility requirements. During the same period Government invested £339 million in the rail network here. This included the purchase of 20 new train sets which came into operation during 2004 and 2005 and a further 23 new train sets which should be all in operation by the end of 2012. All of these trains meet modern accessibility standards.

Coupled with the purchase of modern accessible buses, coaches and rail rolling stock investment has been made in stations to improve accessibility. Brand new facilities have been built in places such as Lisburn, Strabane, Coleraine and Newry. In 2008 a programme of works was completed upgrading and improving stations and halts on the rail network. At the time of writing major accessibility issues remain at only two mainline stations (Antrim and Portadown) where work is progressing to improve facilities.

The Accessible Transport Strategy (ATS) published by DRD in 2005 recognised that improving physical access to transport services was only one aspect of making services accessible and inclusive. The ATS identified other barriers that make using transport difficult for disabled people and older people. These barriers included the absence of inclusive information about services, the attitudes of staff involved in providing the services or in developing policies, and the practices of service providers that make using services difficult for older people and disabled people. The ATS identified positive engagement with disabled

³ Rail Vehicle Accessibility Regulations NI (2001)

⁴ The duty on service providers to make physical alterations to their premises was introduced in Northern Ireland in 2004

⁵ Disability Discrimination (Transport Vehicles) Regulations (NI) 2009

people, older people and their organisations as one way of addressing these barriers.

Translink has been the major beneficiary of investment in public transport in Northern Ireland. Since 2002 Translink has shown a significant commitment to engage with disabled people, older people and their organisations to improve services. Imtac believes that this engagement is an essential component in ensuring continuing investment in transport improvements for disabled people and older people. The Committee believes this engagement has also resulted in wider improvements to the accessibility of public transport in Northern Ireland. These improvements include:

- The provision of more accessible and inclusive information about services
- The use of positive images of disabled people and older people using services in Translink publications
- The production of an Access Policy⁶ and Guide⁷ setting out clear standards of service on both bus and rail
- The provision of disability awareness training to all bus drivers and others involved in providing services
- Engagement with disabled people and older people around the design of new buses and trains resulting in a unique and innovative bus design now in service
- Changes to a number of policies and practices designed to make it easier for disabled people to use services – examples include changing ticketing policies to remove the need for disabled people and older people to queue for tickets and changing bus signage to raise awareness amongst other passengers of the importance of priority seats

⁶ [Translink Access Policy](#)

⁷ [Translink Access Guide](#)

Assessment of the current situation

In assessing the impact of investment Imtac has considered a number of issues. We have looked at recent figures for bus accessibility provided by Translink⁸. We have also considered the various designs of buses operated by Translink. Finally we have carried out an assessment of work done to improve the accessibility of stations and railway halts⁹.

Bus services

Research shows that low-floor buses without steps provide the best access to the greatest range of passengers¹⁰. Bus services figures provided by Translink indicate that Metro services in Belfast are provided using 100% low-floor buses, meeting the full requirements of PSVAR NI. Similar high levels of accessibility apply to Ulsterbus Foyle in Derry/Londonderry and the majority of town services across the Ulsterbus network. Given these services are guaranteed to use low-floor vehicles any reasonable assessment of bus services must conclude that disabled people and older people living in our main cities and towns have a much greater opportunity to use public transport to travel locally than a decade ago.

The picture with the remaining Ulsterbus fleet is not as straightforward for a number of reasons. Firstly figures indicate that despite substantial investment there remain around 10% of older vehicles that do not meet accessibility requirements. These buses have stepped access and do not provide any access for wheelchair users. Secondly Translink has purchased a significant number of vehicles that, whilst meeting PSVAR, do not offer the desired low-floor access. These vehicles offer access to wheelchair users via a lift but have stepped access for other

⁸ Profile of the Metro/Ulsterbus fleet on 01/03/2013

⁹ [Report into access surveys of Translink rail halts](#)

¹⁰ These include MPV (Multibus)1998 Westerlund & Stahl, Taxis for All 2002 Oxley & Stahl and the Determination of Accessible Taxis Requirements 2004 Richardson & Yelding

passengers. There are operational reasons why these buses have been introduced in preference to low-floor vehicles including:

- The unsuitability of low-floor vehicles on some rural roads
- The superior ride quality of high-floor coaches for Goldline commuter services
- The increased capacity of high-floor vehicles essential for transporting children to school

The types of vehicles available vary from depot to depot. In Downpatrick, for example, only 36% of vehicles allow low-floor access whilst in Bangor 87% of vehicles are low-floor. Consequently the mixed fleet of vehicles operating across the Ulsterbus network means that Translink cannot guarantee that vehicles used to deliver many services between towns and cities will meet the requirements of all passengers. Currently Translink advises certain passengers with specific requirements (such as wheelchair users) to provide 24 hours' notice before attempting to use these services. Other passengers (for example people with conditions such as arthritis) will find accessing high-floor vehicles challenging. It is clear that some disabled people and older people will continue to face difficulties using the wider Ulsterbus network. It should be pointed out that despite this the potential does exist for many more disabled people and older people to travel on the wider Ulsterbus network compared to a decade ago.

A number of other issues need to be considered which limit the accessibility of the bus network. The first concerns the limitations of PSVAR NI itself. Unlike RVAR there was no provision under PSVAR made for audio and visual information systems on-board vehicles. This is a major omission and limits the accessibility and usability of bus services. The recent evaluation report¹¹ into the pilot of audio and visual information systems on buses in Belfast has highlighted benefits of the systems to a range of passengers both disabled and non-disabled. In addition PSVAR only permits access to buses and coaches for one wheelchair user and sets maximum dimensions of wheelchair use. Both these issues limit the accessibility of bus travel for wheelchair users with

¹¹ Audio Visual Pilot Project Evaluation Report – DRD April 2012

the maximum dimensions in particular making services inaccessible for many wheelchair users in Northern Ireland.

Secondly bus infrastructure also limits the accessibility of services. In many rural areas hard stands are not available at bus stops and there are often no accessible routes to the bus stops. Whilst many of the main bus stations have been improved there is no provision of audio information about services. Again this restricts the accessibility of what are otherwise good facilities and makes bus travel a challenge for many people with a visual impairment in particular.

Finally access to bus services is limited by the rural nature of Northern Ireland and the nature of individual's impairments¹². This means that many people are required to travel impossible distances to access the bus network in both rural and urban areas. Imtac has for some time advocated different and more flexible approaches to bus services in both urban and rural areas which would enable people to better access local services and the wider accessible public transport network¹³.

Rail network

With regard to the accessibility of the rail network all the rolling stock used meets modern accessibility requirements with exception of the cross-border Enterprise service which has many but not all the required accessibility features. Station improvements (with the exception of Portadown and Antrim) means that the majority of disabled people and older people should be able to travel to and from staffed mainline stations here without having to give any prior notice. This is significant progress compared to a decade ago.

Travel from unstaffed stations and halts is not so straightforward. Improvements made to these facilities over the past decade have made them more useable by more passengers. However despite improvements many of the locations have inherent access difficulties

¹² Research indicates that even walking distances as little as 50 m can be difficult for some disabled people ([Inclusive Mobility](#))

¹³ [Flexible Future - Lessons from the development of demand responsive transport](#)

which may never be adequately resolved.¹⁴ This makes their use by some disabled people and older people impossible without significant assistance. In these circumstances the advice from Translink is that passengers contact the company before attempting to travel. As with Ulsterbus services any assessment must conclude that whilst options have improved remarkably over the past decade we are still some way off the day when the majority of disabled people and older people can routinely use the rail network with full confidence and without making special arrangements.

Other operators

Any assessment of public transport in Northern Ireland should also include mention of the small number of private operators who provide services to the public here. From our research we have concluded that little progress has been made by these operators to improve the accessibility of services to older people and disabled people. Whilst Intac clearly recognises that these operators have not received the same levels of investment and support from Government as Translink many have still received public monies through concessionary travel or DRD grant.

¹⁴ In many locations access can only be accommodated via stepped access or via long ramps

Building on progress

There is no doubt that the past decade has seen significant progress in making the public transport network more accessible to disabled people and older people. Changes in legislation, investment by Government and positive changes made by Translink now mean disabled people and older people have opportunities to use many more bus and rail services than a decade ago. Significant progress has been made to meet targets set by Government to improve access to public transport. However our report clearly illustrates that we have some way to go before disabled people have the same equality of opportunity to use services (without restrictions such as pre-notifying) as non-disabled members of our society.

Imtac recognises that maintaining the current pace of progress will be difficult in such challenging economic times. However the Committee has a number of recommendations designed to build on the progress made to date.

Recommendations

Protecting progress made to date

Accessibility is closely linked to the availability of services – proposed reductions in subsidies to bus and rail services over the next few years have the potential to reduce the levels of services currently available and consequently reduce the accessibility of public transport. **Imtac recommends that all avenues are explored to reduce the impact of savings on service levels if progress made to date is to be maintained.**

Imtac is aware that under proposals for Public Transport Reform potentially more operators may be involved in delivering bus services in Northern Ireland. **Imtac therefore recommends that in order to protect progress made to date it is essential that contracts to provide such services in future include strict accessibility requirements.**

Seeking to further improve accessibility

Whilst progress has been impressive the ambitious RTS targets of full accessibility of vehicles by the end of 2012 will not be met. Whilst the Committee acknowledges the limited finances available, **Imtac recommends that Government considers opportunities, including in year funding, for further investment in replacement of the bus fleet.**

Many disabled people and older people cannot make use of improved public transport because of the distances they need to travel to access services. In order to improve accessibility of services **Imtac recommends that Government look at how best to develop local, flexible transport services in both urban and rural areas as set out in our paper Flexible Future.**

Reviewing policies and practices

The differing accessibility standards of buses and coaches and limitations with the accessibility of infrastructure means that access will be easier on some services and locations than in others. The clearest effect of differential accessibility of services will be the requirement for some disabled people to give notice prior to using services. **We recommend that Translink work with Imtac to examine whether changes to current policies and practices could enhance access to services to reduce the situations where people have to give notice before travelling. In particular we recommend that Translink discuss further with Imtac how the current fleet could be better utilised** – for example would it be possible to guarantee that specific routes or services be low-floor giving disabled people and older people the certainty that journeys (outbound and return) will suit their needs.

Imtac would also recommend this Committee is consulted on all future vehicle purchase to ensure that in future a balance is struck between operational requirements and passenger requirements.

Strengthening legislation to promote greater accessibility

Imtac recommends that PSVAR NI be amended to include the provision of audible and visual information systems as part of the

accessibility requirements of new buses and coaches in Northern Ireland.

Imtac recommends that conduct regulations for drivers similar to those in Great Britain¹⁵ be introduced in Northern Ireland – these regulations require drivers to ensure that disabled people can use accessible vehicles easily.

Increasing usage of the more accessible public transport network

Imtac recommends that additional promotional activity is undertaken to build on the real progress made to improve the accessibility of public transport with a view to increasing the numbers of trips made by older people and disabled people. We would like to work with Translink and DRD to identify ways to progress this objective. Measures could include better, inclusive information about services targeted at disabled and older people, raising awareness and profile of older and disabled people amongst other passengers (for example around priority seats) and targeted support through travel training to give more disabled people and older people the confidence and skills to use public transport.

¹⁵ [Public Service Vehicles \(Conduct of Drivers, Inspectors, Conductors and passengers\) \(Amendment\) Regulations 2002](#)